

THE GENERAL TIRE & RUBBER COMPANY
G.T.R. Chemical Company
Ashtabula, Ohio

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Procedure No.: ENV-2

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Unit: Environmental

Subject: HANDLING AND STORAGE OF
HAZARDOUS WASTE MATERIALS (RCRA)

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INTRODUCTION

To ensure the health and safety of all and to protect the environment from improper disposal of hazardous waste, Congress has promulgated the Resource, Conservation, and Recovery Act (RCRA). These regulations set strict requirements for all facilities that generate, store, transport, or dispose of hazardous waste. These regulations will be enforced by the Environmental Protection Agency.

In order to comply with RCRA Regulations, specific procedures have been written regarding inspections of equipment and storage containers, waste analysis, personnel training, contingency plan, and a closure plan. These procedures must be reviewed by all plant personnel involved with the handling, storage, or disposal of hazardous waste and the procedures must be strictly adhered to.

CONTINGENCY PLAN

1. In the event of fire or explosion, all facility personnel must follow the procedure entitled "Fire Control and Prevention." (FP-1)
2. In the event of the release of Vinyl Chloride to the environment, all facility personnel must follow the procedure entitled "MVC Spill Alarm Procedure." (EMG-1)
3. In addition to the above, the foreman, or emergency co-ordinator, must immediately identify the character, exact source, amount and extent of any released material, and assess possible hazards to human health or the environment, outside the facility.
4. If the emergency co-ordinator determines there is a threat to human health or environment, outside the facility, he must report as follows:
 - a. If his assessment indicates evacuation of local areas may be advisable, he must notify:

(1) Ashtabula County Sheriff's Dept.	Telephone #576-4901
(2) Ashtabula Township Fire Dept.	" 997-5275
(3) Ohio EPA Emergency Response Team	" 800-282-9378
(4) National Response Center	" 800-424-8602
(5) Ashtabula General Hospital	" 998-3111

(or government official designated as on-scene coordinator)

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- b. Report must include:
 - (1) Name and telephone number of reporter
 - (2) Name and address of facility
 - (3) Time and type of incident (e.g., release, fire, etc.)
 - (4) Name and quantity of materials involved
 - (5) The extent of injuries
 - (6) The possible hazards to human health, or environment, outside the facility.
- 5. a. Ashtabula Township Fire Department has primary responsibility for fire and ambulance calls. They will summon additional help from the City of Ashtabula, if required.
- b. Ashtabula County Sheriff's Department is the primary law enforcement agency.
- c. State emergency response team: Ohio EPA Emergency Response Team.
- d. Ashtabula General Hospital is the local hospital that will receive people injured by any fire, explosion, or release of hazardous waste from this facility.
- 6. During an emergency, the emergency coordinator must:
 - a. Take all reasonable measures to insure that fires, explosions, and releases do not occur, recur, or spread to other hazardous waste at the facility.
 - b. If the facility stops operation in response to a fire, explosion, or release, the emergency coordinator must monitor for leaks or pressure build-up in equipment.
 - (1) All emergency equipment must be cleaned and fit for its intended use before operations are resumed.
 - (2) The owner or operator must notify the director and appropriate local authorities that the facility is in compliance with Item (1) above, before operations are resumed in the affected areas of the facility.
- 7. The operator or owner must note in the operating record the date, time, and details of any incident that requires implementing this contingency plan.

Persons Qualified as Emergency Coordinators

<u>Name</u>	<u>Address</u>	<u>Telephone No.</u>
Shift Foreman		
Roy Jackson	7675 Middle Ridge Rd., Madison, Ohio	428-5888
Gerald Brumbaugh	6449 Vrooman Rd., Painesville, Ohio	254-4917
H. Graff	6145 Lake Road West, Ashtabula, Ohio	964-6906

EMERGENCY EQUIPMENT

1. Fire Extinguishing Systems

- a. There are over 80 hand-held fire extinguishers strategically located throughout the plant, plus five 350-pound dry chemical carts. The hand-held fire extinguishers include dry chemical, carbon dioxide, and water extinguishers.
- b. Ten hose houses (fire hydrant plus storage of fire hose).
- c. One foam cart stored in the catalyst storage shed.
- d. Sprinkler systems for all major equipment and buildings throughout the plant.
- e. Foam system located west of old chiller (Caterpillar) building for use on fuel oil storage tanks.
- f. Scott Air Packs - located in the maintenance shop, second floor polymer building, monomer control room, boilerhouse, and resin finishing.
- g. Fire water pumps - located in shed west of UEC building; steam-driven pump is located in the boilerhouse.

2. Communication and Alarm Systems

a. Fire Alarm

This alarm is a steam whistle, like those used on steam locomotives. The number of blasts on the fire whistle indicates the area where the alarm was turned in. For example, three (3) signals from the whistle indicates a Code 3 fire alarm which is the polymer building.

b. MVC Spill Alarm

This alarm is a variable high-pitched siren that is manually activated when there is a serious MVC spill in the plant. This alarm rises and falls. (A helpful way to recall the MVC alarm is to remember that the shape of the letter "M" rises, falls, rises, then falls similar to the alarm.)

c. Public Address System

Access by telephone by dialing 285. System is backed-up by batteries for emergency operation should there be a power failure.

d. Walkie Talkies

The foreman, polymer control room, monomer control room, boilerhouse, and security guard all have walkie-talkies for emergency use.

3. Spill Control Equipment

All tanks containing hazardous chemicals are surrounded by dikes which will contain the volume of material within the tank, should a spill occur.

PERSONNEL TRAINING

Directed by a person trained in hazardous waste management procedures, training to be given to all new employees and reviewed once each year with all employees.

1. All Personnel

a. Familiarize with emergency procedures, emergency equipment, emergency systems, and evacuation procedures.

- (1) Response to Fire Alarm.
- (2) Response to MVC Spill Alarm.
- (3) Response to other hazardous conditions--Foremen will issue verbal instructions.
- (4) Procedures for using, inspecting, repairing, and replacing emergency and monitoring equipment.
 - (a) Scott Air Packs
 - (b) Fire extinguishers
 - (c) Respirators

b. Familiarize with communications and alarm systems

- (1) Public Address System
- (2) Walkie-Talkies
- (3) Spill Alarm
- (4) Fire Alarm

2. Boilerhouse Personnel

a. Operation of Incinerator

- (1) Start-up and shutdown
- (2) Safety interlocks
- (3) Inspection requirements

b. Operation of Boiler as Incinerator (for MVC and Solvent Wastes)

(1) For MVC

- (a) Start-up and shutdown
- (b) Safety interlocks
- (c) Inspection requirements

(2) For Solvent Waste

- (a) Start-up and shutdown
- (b) Safety interlocks
- (c) Inspection requirements
- (d) Handling requirements for solvent waste

3. Lab-Personnel

- a. Placement of solvent into proper container
- b. Storage and handling of solvent waste
- c. Inspection procedures

CLOSURE PLAN

1. All solvent waste from the lab will be incinerated in the boiler before closure of this facility is completed.
2. All equipment containing Vinyl Chloride will be opened according to established procedures that comply with NESHAP regulations for Vinyl Chloride.
3. All Vinyl Chloride waste streams will be incinerated before closure of this facility is complete.
4. All degreasing solvents will be returned to the supplier.
5. It is estimated that approximately one week will be required to close this facility.
6. Based on Item IV above, closure cost is estimated to be \$40,000 (1981 dollars).

INSPECTION PROCEDURE

1. Waste Solvent Storage
 - a. Inspect storage containers once per week for leakage or corrosion. If leakage or corrosion is evident, transfer material into another storage container and dispose of defective container.
 - (1) Waste Cyclohexanone storage can
 - (2) Waste Carbon Disulfide storage can
 - b. Make sure waste storage containers are properly labeled. Record inspection results on inspection card which will become part of the operating record.
2. Incinerator
 - a. Incinerator operating temperature will be monitored once per shift by boilerhouse personnel.
 - b. Incinerator discharge plume will be observed once per shift by boilerhouse personnel.
 - c. Lab personnel will inspect Vinyl Chloride monitoring data periodically.

3. Incineration of Waste Solvent in Boiler

- a. Boilerhouse personnel will monitor system every fifteen minutes for proper operating conditions, i.e., temperature, plume, etc.

WASTE ANALYSIS PLAN

1. Vinyl Chloride Vent Stream

- a. Analyze for VC1, VAC, TCE, O₂, N₂, water.
- b. Above listed compounds are the only possible significant compounds in the stream; any other compounds would be present only in trace amounts.
- c. Use gas chromatography for analysis of sample.
- d. Samples of vent stream are obtained from bleed valve on piping to incinerator.
- e. Review of this waste analysis plan is not required on a periodic basis unless a significant process change is made.

2. Laboratory Waste Carbon Disulfide

Only Waste Carbon Disulfide is placed in this container--no analysis is therefore required.

3. Other Waste Lab Solvents

Other waste lab solvents are placed in a separate storage container--will contain a mixture of Cyclohexanone and Acetone. Other solvents will be present only in insignificant amounts.

EVACUATION

In the event that an evacuation is announced, follow the Vinyl Chloride Monomer Spill Procedure and Evacuation Plan (EMG-1).